

### **REMARKS**

Claims 1, 3, 5-11, 13, 15-19, 21-22, 24, 26-32, 34, and 36 are presently pending in this application. Claims 1, 3, 5-6, 11, 13, 15-16, 22, 24, 26-27, 32, 34, and 36 have been amended; and claims 2, 4, 12, 14, 20, 23, 25, 33, and 35 have been canceled.

In the August 10, 2007 Office Action, claims 1-19 and 21-36 were rejected. More specifically, the status of the application in light of this Office Action is as follows:

(A) Claims 1-3, 7-8, 10-13, 17-18, 22-24, 28-29, 31-34, and 36 were rejected under 35 U.S.C. § 102(e) as being anticipated by U.S. Patent Application Publication No. 2002/0116240 to Hsuan ("Hsuan");

(B) Claims 9, 19, and 30 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Hsuan; and

(C) Claims 4-6, 13-16, 21, 25-27, and 35 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Hsuan, and further in view of U.S. Patent No. 6,463,345 to Peachey-Kountz et al. ("Peachey-Kountz").

A. Response to Cited Art Rejections over Hsuan and Peachey-Kountz

The pending claims stand rejected over Hsuan, alone or in combination with Peachey-Kountz. Applicant respectfully traverses these rejections.

Applicant's techniques are directed to tracking orders at a unit level. One aspect of applicant's techniques provides a unit order system that interfaces with an existing order processing system to track orders at the unit level. The existing order processing system provides an order database that typically includes an order record for each order and an item record for each item of the order. Applicant's unit order system provides a unit order database that includes a record for each unit of each item of each order in the order database. The unit order database is created using information from the existing order database. In particular, the unit order database is created by (1) adding a plurality of records to the unit order database, where each record added to the unit order database represents a unit of an item of a new order of the existing order database, and (2) when the quantity of units of an item of an existing order has

changed, adding to the unit order database records representing increased units of the item, and setting records in the unit order database representing decreased units of the item to canceled. The unit order system periodically accesses the existing order processing system's order database to identify new orders or changes to existing orders in order to update the unit order database to reflect the new, changed, or canceled orders.

Hsuan describes a network server for servicing articles of wear (e.g., clothing), such as those that require a certain degree of cleanness. Each article is tracked by a unique article identifier. The unique article identifier may ensure, for example, that the proper servicing process is used for the article. The server is comprised of several databases, including a customer database, an article database, an order database, and a last-serviced database. Hsuan's article database catalogs articles according to their unique article identifiers and associates articles with customer identifiers. Hsuan's order database tracks the process status of articles according to their unique article identifiers.

Peachey-Kountz describes an availability checking system that matches assets to demands. The system considers assets and demands across multiple order management systems and manufacturing facilities. A demand configuration process coordinates product requests according to rules and priorities assigned to the requests, based on information from the demand source.

In the first instance, Hsuan fails to describe a problem to which applicant's techniques are directed: an existing order database that does not support tracking of orders at a unit level. The Examiner apparently believes that Hsuan's order database corresponds to applicant's existing order database. However, Hsuan describes an order database in which each order contains only one unit of an item. Hsuan describes, "Each entry 91 [in the order database] is for a laundry service order for a particular article of wear 300." (Hsuan, ¶ [0037] (emphasis added).) Each of Hsuan's "articles" is a single article that has a unique article identifier associated with it. (See, e.g., Hsuan ¶ [0038].) There is no indication in Hsuan that an order may be placed for more than one unit of an item. For example, Hsuan's Figure 8 illustrates an order form that may be generated by the system. The form apparently only allows a customer to request servicing on one unit of each item. Hsuan describes, "The customer may also use the boxes 357 to fill in the article identification 310 of the article 300 for which the service is requested." (Hsuan, ¶ [0035]

(emphasis added).) For example, the form apparently only allows the customer to request servicing of one hood according to Class A cleaning, such as by entering one article identifier in box 357. Because an order may only be placed for one unit of an item, Hsuan has no need to create a unit order database that allows tracking of orders at a unit level as in applicant's techniques.

Claims 1, 3, 5-11, 13, 15-19, 21-22, 24, 26-32, and 34 recite "creating a unit order database using information from the [or an] existing order database." Claim 36 recites "the unit order database created using information from the existing order database." As indicated above, the Examiner apparently believes that Hsuan's order database corresponds to applicant's existing order database. In addition, the Examiner apparently believes that Hsuan's article database corresponds to applicant's unit order database. However, Hsuan's article database is not created "using information from" Hsuan's order database. While each of Hsuan's databases may contain one or more of the same items of information, such as article ID (*see, e.g.*, Figs. 10 and 11), each of the databases is apparently created independently of each other database. Unlike applicant's techniques, Hsuan offers no teaching or suggestion that its article database is created "using information from" its order database.

Claims 1, 3, 5-10, 22, 24, 26-32, 34, and 36 recite "wherein creating the unit order database comprises: adding a plurality of records to the unit order database, each record representing a unit of an item of a new order of the existing order database." Claims 11, 13, 15-19, and 21 recite "wherein the means for creating the unit order database comprises: means for adding a plurality of records to the unit order database, each record representing a unit of an item of a new order of the existing order database." The Examiner cites Hsuan's abstract as disclosing "wherein the creating of the unit order database includes adding a record for each unit of each item for each new order of the existing order database," which was previously recited in now-canceled dependent claim 2. (Office Action, August 10, 2007, p. 3.) However, applicant can find nothing in Hsuan's abstract that teaches or suggests this feature. Hsuan does not teach or suggest "creating the unit order database," nor does it teach or suggest "adding a plurality of records to the unit order database, each record representing a unit of an item of a new order of the existing order database" as recited.

Claims 1, 3, and 5-10 recite "wherein each record [added to the unit order database] includes an [or the] order number and an [or the] order item identifier of the corresponding order in the existing order database." Although applicant maintains that this feature is not necessary to overcome the cited references, applicant has elected to amend these claims in the manner suggested by the Examiner. (Office Action, August 10, 2007, p. 5.) In particular, applicant has amended the claims to clarify "how" the unit order database is created "using information from the existing order database" as recited, and "what information" from the existing order database is used. Support for these amendments may be found, for example, in the Specification at page 6, lines 3-7. Neither of the cited references discloses or suggests "wherein each record [added to the unit order database] includes an [or the] order number and an [or the] order item identifier of the corresponding order in the existing order database" as recited.

Claims 1, 3, 5-10, 22, 24, 26-32, 34, and 36 recite "wherein creating the unit order database comprises: ... when the quantity of units of an item of an existing order has changed, adding records representing increased units of the item to the unit order database [...], and setting records of the unit order database representing decreased units of the item to canceled." Claims 11, 13, 15-19, and 21 recite "wherein the means for creating the unit order database comprises: ... when the quantity of units of an item of an existing order has changed, means for adding records representing increased units of the item to the unit order database and means for setting records of the unit order database representing decreased units of the item to canceled." The Examiner acknowledges that Hsuan fails to teach "when the quantity of units of an item of an existing order has changed, adding a record for each increased unit of the item, and setting a record to canceled for each decreased unit of the item," which was previously recited in now-canceled dependent claim 4. The Examiner cites Peachey-Kountz as disclosing "the use of orders where the quantity of items are changed and modified due to backorders or cancellation of orders, and the record status is updated to reflect the change." (Office Action, August 10, 2007, p. 4.) However, the cited portions of Peachey-Kountz (Figs. 5-7; 11:53-67; Detailed Description corresponding to Figs. 5-6) do not teach or suggest "when the quantity of units of an item of an existing order has changed, adding records representing increased units of the item to the unit order database [...], and setting records of the unit order database representing decreased units of the item to canceled." The portions of Peachey-Kountz that correspond to Figures 5 and 6 (7:66-9:8) describe a demand configuration process, in which a demand class (i.e., priority) is set

for each order. A different demand class may be set for each type of order, such as a backorder, firm order, order move-in, order move-out, or new order. The second cited portion of Peachey-Kountz (11:53-67) describes that the system receives new requests, including order move-ins and order move-outs. If such a request occurs within a "frozen zone period," the request is not granted (i.e., it is flagged as an error), and prior commitments for the order are unchanged. If the request occurs outside of the frozen zone period, the prior commitment is replaced with the new request. As described in the prior cited portions of Peachey-Kountz, however, replacing the prior commitment occurs by deleting the prior commitment in the demand file and replacing it by the current demand. The modification takes place within a current record (i.e., file); no records are added or set to canceled as in applicant's techniques. Neither of the cited portions of Peachey-Kountz teach or suggest "wherein creating the unit order database comprises: ... when the quantity of units of an item of an existing order has changed, adding records representing increased units of the item to the unit order database [...], and setting records of the unit order database representing decreased units of the item to canceled" or "wherein the means for creating the unit order database comprises: ... when the quantity of units of an item of an existing order has changed, means for adding records representing increased units of the item to the unit order database and means for setting records of the unit order database representing decreased units of the item to canceled" as recited.

Claims 1, 3, and 5-10 recite "each record in the unit order database having a reference to the record of a corresponding order in the existing order database." Claims 11, 13, 15-19, 21-22, 24, 26-32, and 34 recite "each record in the unit order database having a reference to a corresponding order in the existing order database." As described above, the Examiner apparently believes that Hsuan's order database corresponds to applicant's existing order database and that Hsuan's article database corresponds to applicant's unit order database. However, Hsuan offers no teaching or suggestion that each record in its article database has a reference to a corresponding order in its order database. While records in each of Hsuan's databases may contain one or more of the same items of information, such as article ID (*see, e.g.*, Figs. 10 and 11), applicant can find no teaching or suggestion that each record in Hsuan's article database has "a reference to the record of a corresponding order" in Hsuan's order database.

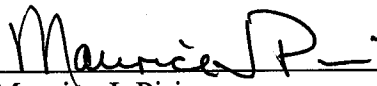
Accordingly, the pending claims are patentable over the cited art.

B. Conclusion

In view of the foregoing, the pending claims comply with 35 U.S.C. § 112 and are patentable over the applied art. The applicant accordingly requests reconsideration of the application and a Notice of Allowance. If the Examiner has any questions or believes a telephone conference would expedite prosecution of this application, the Examiner is encouraged to contact the undersigned at (206) 359-8548.

Respectfully submitted,  
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